



Department of Energy  
Brookhaven Group  
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**JUN 09 2000**

Dr. John H. Marburger  
Brookhaven Science Associates, LLC  
Brookhaven National Laboratory  
Upton, New York 11973

Dear Dr. Marburger:

**SUBJECT: BROOKHAVEN NATIONAL LABORATORY (BNL)  
INTEGRATED SAFETY MANAGEMENT SYSTEM (ISMS)  
APPROVAL**

Attached is the approval letter from Dr. Robert L. San Martin, CH Manager, for the BNL ISMS. I am pleased that this extensive effort has lead to a highly successful result.

The letter requests a plan and schedule to address five opportunities for improvement related to feedback and improvement. These are referenced in an attached enclosure to the letter. In addition, please provide, for BHG concurrence, documented resolutions of the other BNL opportunities for improvement described in the Verification Report.

Kindly have the appropriate members of your staff arrange a meeting with Bob Desmarais, (5434) of my staff to discuss the letter's requirements and determine the path to closure of these improvement opportunities.

Sincerely,

A handwritten signature in black ink, appearing to read "George J. Malosh", is positioned above the printed name.

George J. Malosh  
Brookhaven Group Manager

Enclosure:  
As stated

cc: R. Desmarais, BHG, w/encl.  
W. Harold, BHG, w/encl.



Department of Energy  
Chicago Operations Office  
9800 South Cass Avenue  
Argonne, Illinois 60439

**MAY 26 2000**

George J. Malosh  
Brookhaven Group Manager

SUBJECT: BROOKHAVEN NATIONAL LABORATORY (BNL) INTEGRATED SAFETY  
MANAGEMENT SYSTEM (ISMS) APPROVAL

The team that I chartered has completed the combined Phase I and Phase II ISM Verification Review of BNL. The Review identified several noteworthy practices along with Areas for Improvements that were not considered to be significant deficiencies. It is the review team's judgement that BNL has successfully implemented an ISMS and they have recommended that I approve the System.

BNL's Environmental Management System was cited as a noteworthy example for consideration by other Department of Energy facilities. The team noted that BNL has achieved ISO 14001 registration at the RHIC Project and is on schedule for registration of four other facilities by August 2000, and the entire site by the end of Fiscal Year 2001. I am very pleased by this demonstrated commitment to environmental management.

I have reviewed the Areas for Improvement and, in particular, noted that there are five that are associated with the Laboratory's Feedback and Improvement process. (These five are summarized in the enclosure). When taken together, these Areas for Improvement involve essentially every component of the Feedback and Improvement process (ISM Core Function 5) and lead me to conclude that BNL needs to strengthen this process. Please provide me with a plan and schedule to address these areas.

You should direct BNL to document resolutions, concurred in by the Brookhaven Group (BHG), for the BNL opportunities for improvement described in the Verification Report except for those noted in the enclosure, which I consider to be less important than the other issues raised in the Report. You should also resolve the BHG opportunities for improvement in this Verification Report.



George J. Malosh

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**MAY 26 2000**

Based on the successful implementation of ISM at BNL, as verified by this review, I approve the ISMS at BNL.

A handwritten signature in black ink, appearing to read "Robert L. San Martin", with a stylized flourish at the end.

Robert L. San Martin  
Manager

Enclosure:  
As Stated

## **Enclosure**

There are five Areas for Improvement that pertain to the Laboratory's Feedback and Improvement process<sup>1</sup> that are associated with Feedback and Improvement:

**BNL - 1**, which identifies a need for improvement in the Laboratory's self-assessment system (including causal factor and trend analyses).

**BNL - 2**, which identifies poor implementation of the Laboratory's Lessons Learned Program. It is identified that available information from various mechanisms is not being captured for lessons learned and improvement actions, lessons learned are not communicated across the entire Laboratory, and an employee suggestion system is needed.

**BNL - 3**, which recognizes that a process to ensure immediate actions to control hazards while long term corrective actions are being developed, was not apparent. Additionally, not all items that have institutional implications are being tracked, and a large percentage of the items being tracked are not being completed on a timely basis.

**BNL - 11**, which identifies needed improvement in the Laboratory's Quality Assurance Program. Quality Assurance is a key mechanism for continuous improvement. This may have increased significance because of the report's notation concerning potential 10 CFR 830.120 (Nuclear Safety Quality Assurance Rule) implications.

**BNL - 12**, which identifies the need for BNL and BHG to focus on their Feedback and Improvement process.

Taken together these Areas for Improvement address practically every component of a Feedback and Improvement process (ISM Core Function 5). Therefore, I conclude that BNL needs to strengthen this process.

Additionally, I consider three Areas for Improvement to be of lesser significance than the others as they appear to address conditions in which implementation is adequate, but the documentation is incomplete. These are:

**BNL - 6**, which addresses documentation of subcontractor ES&H training.

**BNL - 10**, which addresses the lack of reference of ISM and the Laboratory's Standards Based Management System in the Laboratory's Employee Handbook.

**BHG - 1**, which addresses the status of updating several BHG procedures.

Resolution of these Areas for Improvement should be given lesser priority than the other Areas noted in the report.

<sup>1</sup> For clarification of this analysis the BNL and BHG Areas for Improvement have been sequentially numbered in the order in which each is bulletized.